

From: [Lockard, Victoria D. \(Shld-Atl-LT\)](#)
To: [BVP; Harkins, Steven M. \(Assoc-ATL-LT\)](#)
Cc: [Rubenstein, Brian \(Shld-PHIL-LT\)](#); [Cohen, Lori \(Shld-Atl-LT\)](#); SAGoldberg@duanemorris.com; CCT@pietragallo.com; sarah.johnston@btlaw.com; JPrirelac@duanemorris.com; valpec@kirtlandpackard.com; [Greene, Jeffrey \(Shld-Bos-LT\)](#)
Subject: RE: Valsartan - 2020.07.01 BHR Correspondence to Pltfs Regarding CMML
Date: Saturday, July 4, 2020 10:55:14 AM
Attachments: [image003.png](#)

Behram,

We will be responding further on Monday to the points below, but let us know what time Tuesday would work for a call.

Victoria Davis Lockard

Shareholder
Vice-Chair, Pharmaceutical, Medical Device & Health Care Litigation
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From: BVP [<mailto:bvp@kirtlandpackard.com>]
Sent: Thursday, July 2, 2020 4:13 PM
To: Harkins, Steven M. (Assoc-ATL-LT) <harkinss@gtlaw.com>
Cc: Rubenstein, Brian (Shld-PHIL-LT) <rubensteinb@gtlaw.com>; Cohen, Lori (Shld-Atl-LT) <CohenL@gtlaw.com>; Lockard, Victoria D. (Shld-Atl-LT) <lockardv@gtlaw.com>; SAGoldberg@duanemorris.com; CCT@pietragallo.com; sarah.johnston@btlaw.com; JPrirelac@duanemorris.com; valpec@kirtlandpackard.com
Subject: RE: Valsartan - 2020.07.01 BHR Correspondence to Pltfs Regarding CMML

EXTERNAL TO GT

Steven,

We are in receipt of your letter. We have done some research into the platform Teva proposes to use and Plaintiffs do not agree to Teva's proposal to use CMML for review and production of documents to Plaintiffs at this time, but are willing to meet and confer regarding Teva's proposal in order to better understand how Teva proposes to use the platform. Please let me know when you are available next week to meet & confer.

Best regards,

Behram

From: harkinss@gtlaw.com <harkinss@gtlaw.com>

Sent: Wednesday, July 1, 2020 4:38 PM

To: valpec@kirtlandpackard.com; ASlater@mazieslater.com; RHonik@golombhonik.com; DStanoch@GolombHonik.Com; c.whiteley@kanner-law.com; dnigh@levinlaw.com; bvp@kirtlandpackard.com

Cc: rubensteinb@gtlaw.com; CohenL@gtlaw.com; lockardv@gtlaw.com; SAGoldberg@duanemorris.com; CCT@pietragallo.com; sarah.johnston@btlaw.com; JPrirelac@duanemorris.com

Subject: Valsartan - 2020.07.01 BHR Correspondence to Pltfs Regarding CMML

Counsel,

On behalf of Brian Rubenstein, please see the attached correspondence.

Best,

Steven M. Harkins
Associate

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